

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

PHILIP SANDERS, an Individual and Husband)
And Next of Kin of BRENDA JEAN SANDERS,)
Deceased,)

Plaintiff,)

vs.)

Case No. 17-CV-492-JED-FHM

TURN KEY HEALTH CLINICS, a limited liability)
company,)

Defendants.)

**DEFENDANT TURN KEY HEALTH CLINICS, LLC's
EXPERT WITNESS DISCLOSURES**

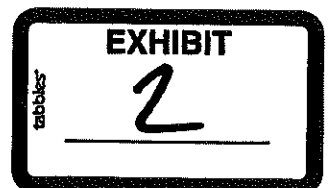
COMES NOW the Defendant, Turn Key Health Clinics, LLC (hereinafter "Defendant" or "Turn Key"), by and through the undersigned counsel, and pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedures and this Court's Third Amended Scheduling Order [Doc. 68], respectfully submits its Expert Witness Disclosures:

RETAINED EXPERTS

<u>Witness</u>	<u>Proposed Testimony</u>
Kimberly M. Pearson, MHA, MBA, RN, CCHP 1615 Ashland Bluff Way Reno, NV 89523	See Enclosed Report.
Alex John, M.D. Forensic Pathologist 205 Hilbig Road Conroe, TX 77301	See Enclosed Report.

NON-RETAINED EXPERTS

<u>Witness</u>	<u>Proposed Testimony</u>
Lela Goatley, APRN-CNP c/o JOHNSON HANAN VOSLER HAWTHORNE & SNIDER	Facts and circumstances regarding allegations in Plaintiff's Second Amended Complaint and Plaintiff's claims against Defendant Turn



<p>9801 N. Broadway Extension Oklahoma City, OK 73114</p>	<p>Key. Adequacy of health care provided to Brenda Sanders at the Creek County Detention Center. Standards of care. Nurse Practitioner Goatley will further testify that Turn Key healthcare staff at the Creek County Detention Center acted appropriately, within the applicable standard of care, and exhibited no deliberate indifference in providing care and treatment to Brenda Sanders. <i>See also</i> APRN Goatley's deposition in this matter.</p>
<p>Nicholas Groom, LPN c/o JOHNSON HANAN VOSLER HAWTHORNE & SNIDER 9801 N. Broadway Extension Oklahoma City, OK 73114</p>	<p>Facts and circumstances regarding allegations in Plaintiff's Second Amended Complaint and Plaintiff's claims against Defendant Turn Key. Adequacy of health care provided to Brenda Sanders at the Creek County Detention Center. Standards of care. Nurse Groom will further testify that Turn Key healthcare staff at the Creek County Detention Center acted appropriately, within the applicable standard of care, and exhibited no deliberate indifference in providing care and treatment to Brenda Sanders. <i>See also</i> Nurse Groom's deposition in this matter.</p>
<p>Cheryl Green, LPN c/o JOHNSON HANAN VOSLER HAWTHORNE & SNIDER 9801 N. Broadway Extension Oklahoma City, OK 73114</p>	<p>Facts and circumstances regarding allegations in Plaintiff's Second Amended Complaint and Plaintiff's claims against Defendant Turn Key. Adequacy of health care provided to Brenda Sanders at the Creek County Detention Center. Standards of care. Nurse Green will further testify that Turn Key healthcare staff at the Creek County Detention Center acted appropriately, within the applicable standard of care, and exhibited no deliberate indifference in providing care and treatment to Brenda Sanders. <i>See also</i> Nurse Green's deposition in this matter.</p>
<p>Tamara Jackson, LPN c/o JOHNSON HANAN VOSLER HAWTHORNE & SNIDER 9801 N. Broadway Extension Oklahoma City, OK 73114</p>	<p>Facts and circumstances regarding allegations in Plaintiff's Second Amended Complaint and Plaintiff's claims against Defendant Turn Key. Adequacy of health care provided to Brenda Sanders at the Creek County</p>

	Detention Center. Standards of care. Nurse Jackson will further testify that Turn Key healthcare staff at the Creek County Detention Center acted appropriately, within the applicable standard of care, and exhibited no deliberate indifference in providing care and treatment to Brenda Sanders.
Kerri Ferris, LPN c/o JOHNSON HANAN VOSLER HAWTHORNE & SNIDER 9801 N. Broadway Extension Oklahoma City, OK 73114	Facts and circumstances regarding allegations in Plaintiff's Second Amended Complaint and Plaintiff's claims against Defendant Turn Key. Adequacy of health care provided to Brenda Sanders at the Creek County Detention Center. Standards of care. Nurse Jackson will further testify that Turn Key healthcare staff at the Creek County Detention Center acted appropriately, within the applicable standard of care, and exhibited no deliberate indifference in providing care and treatment to Brenda Sanders.

Respectfully submitted,

s/ Paulina Thompson
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 Health Clinics, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the **10th day of August, 2020**, a true and correct copy of the above and foregoing documents was sent *via electronic mail* and *U.S. First Class Mail* to the following:

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s/ Paulina Thompson
Paulina Thompson